1 Leslie A. Bailey (SBN 232690) lbailey@publicjustice.net Jennifer D. Bennett (SBN 296726) jbennett@publicjustice.net Public Justice, P.C. 4 555 12th Street, Suite 1230 5 Oakland, CA 94607 Phone: (510) 622-8150 6 Fax: (510) 622-8155 7 8 Attorneys for Intervenor Center for Auto Safety UNITED STATES DISTRICT COURT 10 FOR THE CENTRAL DISTRICT OF CALIFORNIA 11 Case No. 2:13-cv-08080-DDP (VBKx) 12 PETER VELASCO, et al., 13 **NOTICE** OF **MOTION** TO Plaintiffs, INTERVENE OF CENTER FOR 14 **AUTO SAFETY** 15 v. Date: December 1, 2014 16 CHRYSLER GROUP LLC, Time: 10:00 a.m. 17 Judge: Honorable Dean D. Pregerson Defendant. Courtroom: 3 18 19 20 The Center for Auto Safety ("the Center"), by and through counsel, hereby 21 22 moves this Court to intervene pursuant to Federal Rule of Civil Procedure 24(b) for 23 the limited purpose of seeking public access to the sealed court records in *Velasco* 24 v. Chrysler. The Center's grounds for this Motion are set forth in the 25 26 accompanying memorandum in support thereof. Pursuant to L.R. 7-3, this motion 27 is made following conferences with plaintiffs' counsel on October 1, 2014 and 28

with defendant's counsel on October 16, 2014. The plaintiffs do not oppose this motion. Dated this 23<sup>rd</sup> of October, 2014 /s/ Leslie A. Bailey Leslie A. Bailey Leslie A. Bailey lbailey@publicjustice.net Jennifer D. Bennett jbennett@publicjustice.net Public Justice, P.C. 555 12th Street, Suite 1230 Oakland, CA 94607 Phone: (510) 622-8150 Fax: (510) 622-8155 Attorneys for Intervenor The Center for Auto Safety